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December 23, 2019

VIA ECF

Honorable Vera M. Scanlon
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

**Re: Marguerite Gabriel v. Newrez LLC
19-cv-06738 (RRM) (VMS)**

Dear Judge Scanlon:

We represent Shellpoint Loan Servicing, sued herein as Newrez LLC f/k/a/ New Penn Financial LLC d/b/a Shellpoint Mortgage Servicing, in the above-referenced action. We submit this letter to request a thirty-day extension of time to respond to the complaint due December 24, 2019. There have been no previous requests for extension, and the extension will not affect any other scheduled dates.

The reason for this request is that we were recently retained and require additional time to investigate the allegations of the complaint and, if appropriate, seek an early resolution of the matter.

Adam Michael Birnbaum, Esq., counsel for plaintiff Marguerite Gabriel consents to this request. Therefore, we respectfully request defendant Shellpoint's time to respond to the complaint be extended to January 23, 2020.

Thank you for your consideration of this request.

Respectfully submitted,

/s/ Jordan M. Smith

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Honorable Vera M. Scanlon

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cc: Adam Michael Birnbaum, Esq. (via CM/ECF)
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